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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 LAS VEGAS CANNABIS AWARDS, LLC, a
18 Nevada limited liability company; and
19 SHELDON COOPER, an individual,

20 Plaintiffs,

21 v.

22 VILLANO ENTERPRISES, INC., a foreign
23 business entity; CHLOE VILLANO, an
24 individual d/b/a Villano Enterprises; and CHLOE
25 VILLANO, an individual,

26 Defendants.

27 CASE NO.: 2:21-cv-00900-JAD-VCF

28 **PLAINTIFFS' EX PARTE
MOTION FOR EXTENSION OF
DEFENDANTS'
TIME TO ANSWER OR RESPOND
TO COMPLAINT**

(First Request)

Pursuant to LR IA 6-1, LR IA 6-2, and Fed. R. Civ. P. 6(b), Plaintiffs Las Vegas Cannabis Awards, LLC and Sheldon Cooper (together, the "Plaintiffs"), move on an *ex parte* basis for a 41-day extension of the time, the fortieth day falling on the prior Sunday, for Defendants Villano Enterprises, Inc. and Chloe Villano, individually and d/b/a Villano Enterprises (together, the "Defendants"), to answer or otherwise respond to the Complaint filed in this action (ECF No. 1). This is the first request for such an extension.

Plaintiffs hereby submit this motion on an *ex parte* basis as Defendants are currently represented by out-of-state-counsel and have not yet retained Nevada counsel with which Plaintiffs could stipulate to the requested extension. Plaintiffs further submit this motion in association with Defendants' out-of-state counsel's agreement to accept service of process of the Summons and

1 Complaint in this action, by which Plaintiffs may avoid the cost and time expenditures associated
2 with personally serving Defendants. Defendants' out-of-state-counsel has agreed to accept service
3 of the Summons and Complaint effective as of May 11, 2021.

4 Insofar as Defendants need to identify and engage Nevada counsel, and as a professional
5 courtesy in consideration of accepting service of process, Plaintiffs respectfully request that this
6 Court grant the consented forty-one-day extension. If granted, Defendants' time to answer or
7 otherwise respond to the Complaint shall be extended as follows:

<u>Party</u>	<u>Current Deadline</u>	<u>Extended Deadline</u>
Villano Enterprises, Inc.	****	July 12, 2021
Chloe Villano individually and d/b/a	****	July 12, 2021
Villano Enterprises		

12 For the reasons set forth above, Plaintiffs respectfully request that the Court grant an
13 extension until July 12, 2021 for Defendants to answer or otherwise respond to the Complaint.
14

DATED this 4th day of June, 2021.

15 **HOLLEY DRIGGS LTD.**

16
17 */s/ James D. Boyle*
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26
27 *Attorneys for Plaintiffs*

28 IT IS SO ORDERED:


29
30 UNITED STATES MAGISTRATE JUDGE

31 DATED: 6-7-2021